

Exhibit "D"

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JAMES A. SOUDER and LANA SOUDER **CIVIL ACTION**
Plaintiffs

NO.: 05-780

v.

ALABAMA MOTOR EXPRESS, INC.
and
ERIC M. BRION
Defendants

**FEDERAL RULE OF CIVIL PROCEDURE 26(a)(1) INITIAL DISCLOSURES OF
DEFENDANTS ALABAMA MOTOR EXPRESS, INC. AND ERIC M. BRION**

Defendants Alabama Motor Express, Inc. and Eric M. Brion submit the following disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1):

A. Eric M. Brion, 210 Damascus Road, Enterprise, Alabama, 36630

James Souder

Lana Souder

All individuals identified by Plaintiffs.

B. Defendant have obtained medical records pursuant to subpoena regarding Mr. Souder's prior injuries. Copies of the subpoenas have been sent to Plaintiff's counsel. These documents are located in defense counsel's office and are available for inspection and copying upon request.

C. Not applicable. Defendants do not have the information to compute Plaintiffs' damages.

D. Defendant Alabama Motor Express, Inc. is insured by a policy of insurance by Lincoln General Insurance Company. A copy of the Declaration Page is attached.

LAW OFFICES OF THOMAS J. WAGNER

By: /s/ Thomas J. Wagner
THOMAS J. WAGNER, ESQUIRE
CELESTE HARRISON, ESQUIRE
Attorneys for Defendants Alabama Motor Express,
Inc. and Eric M. Brion

Dated: June 13, 2005

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing Initial Disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1) were served on the following counsel via First Class Mail, Postage Prepaid on the date noted below:

David B. Winkler, Esquire
Law Offices of David B. Winkler, P.C.
1930 Route 70 East
Building Q
Cherry Hill, NJ, 08003

LAW OFFICES OF THOMAS J. WAGNER

By: /s/ Thomas J. Wagner
Thomas J. Wagner, Esquire
Celeste C. Harrison, Esquire
Attorneys for Defendants Alabama Motor Express,
Inc. and Eric M. Brion

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